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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

JANE DOE,

Plaintiff,

vs.

JOSEPH LOMBARDO, Governor of Nevada, in  
his official capacity; AARON FORD, Attorney  
General of Nevada, in his official capacity; NYE  
COUNTY; ELKO COUNTY; STOREY  
COUNTY; WESTERN BEST, INC., D/B/A  
CHICKEN RANCH; WESTERN BEST, LLC;  
DESERT ROSE CLUB, LLC; HACIENDA  
ROOMING HOUSE, INC. D/B/A BELLA'S  
HACIENDA RANCH; MUSTANG RANCH  
PRODUCTIONS, LLC D/B/A MUSTANG  
RANCH LOUNGE, LLC; LEONARD 'LANCE'  
GILMAN, in his official capacity; and LEONARD  
'LANCE' GILMAN, in his individual capacity,

Defendants.

Case No.: 3:24-cv-00065-MMD-CSD

**PLAINTIFF'S REQUEST FOR  
ENTRY OF DEFAULT AGAINST  
DEFENDANT HACIENDA  
ROOMING HOUSE, INC., D/B/A  
BELLA'S HACIENDA RANCH**

**INTRODUCTION**

COMES NOW Plaintiff Jane Doe (“Plaintiff”) by and through her counsel of record and whom was admitted by *pro hac vice*, Christen M. Price of the National Center on Sexual Exploitation, and hereby files this Request for Entry of Default against Defendant Hacienda Rooming House, Inc., d/b/a Bella’s Hacienda Ranch (“Bella’s”) pursuant to Fed. R. Civ. P. 55(a). This Default is made based on the papers and pleadings on file herein, the attached Memorandum of Points of Authorities and exhibits attached thereto, the declaration of Christen M. Price, and any arguments of counsel that the Court may entertain at a hearing on this matter.

Dated: August 29, 2024

/s/ Christen M. Price

Christen M. Price

*Admitted Pro Hac Vice*

## **MEMORANDUM OF POINTS AND AUTHORITIES**

### **I. INTRODUCTION**

On February 8, 2024, Plaintiff filed her Complaint for Declaratory and Injunctive Relief (“Complaint”). [ECF No. 1]. Among the named Defendants in the Complaint was Hacienda Rooming House, Inc., d/b/a Bella’s Hacienda Ranch (“Bella’s”). On April 9, 2024, Bella’s was served the Complaint. [ECF No. 57]. To date, Defendant Bella’s has failed to answer, plead in response to, or otherwise defend against the Complaint.

### **II. LEGAL ARGUMENT**

A Defendant must file an answer within 21 days of being served with the summons and the complaint unless the Defendant has timely waived the service. Fed. R. Civ. P. 12. “When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party’s default.” Fed. R. Civ. P. 55(a).

Defendant’s responsive pleading to the Complaint was due on or before April 30, 2024. No responsive pleading was filed; nor did Bella’s request or stipulate to any kind of extension. More than 21 days have passed since service to Defendant Bella’s. To date, Defendant Bella’s has failed to answer, plead, or otherwise defend as required by Fed. R. Civ. P. 12. Therefore, pursuant to Fed. R. Civ. P. 55(a), the clerk must enter the party’s default.

### **III. CONCLUSION**

For the foregoing reasons, Plaintiff respectfully requests this Court grant entry of default against Defendant Bella’s.

Dated: August 29, 2024

/s/ Christen M. Price  
Christen M. Price  
(admitted Pro Hac Vice)

Benjamin W. Bull\*  
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GUINASSO LAW  
*Attorneys for Plaintiff*

**ELECTRONIC CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I hereby certify that on this 29th day of August, 2024, a true and correct copy of the foregoing **PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANT HACIENDA ROOMING HOUSE, INC., D/B/A BELLA'S HACIENDA RANCH** was electronically filed with the United States District Court. Electronic service of the foregoing document shall be made in accordance with the Master Service List.

/s/ Jennifer Johnson

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I hereby certify that on this 29th day of August, 2024, a true and correct copy of the foregoing **PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANT HACIENDA ROOMING HOUSE, INC., D/B/A BELLA'S HACIENDA RANCH** was sent via first class mail, postage prepaid, to Defendant Hacienda Rooming House, Inc., d/b/a Bella's Hacienda Ranch, Attn: Registered Agent, Bella Shauna Cummins, 623 8th Street, Wells, NV 89835.

/s/ Jennifer Johnson